

FILED

2012 MAY 16 PM 1:43

U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
September 2011 Grand Jury

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
GERALDO RAYMOND SANTOS,)
)
aka "Sugarbear," and)
)
DANNY JOSE SALAZAR,)
)
aka "Lonely,")
)
Defendants.)

No. CR 12-00471

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy
to Distribute Methamphetamine;
21 U.S.C. §§ 841(a)(1),
841(b)(1)(A)(viii):
Distribution of
Methamphetamine]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown, and continuing to on or about
May 16, 2012, in Los Angeles County, within the Central District
of California, and elsewhere, defendants GERALDO RAYMOND SANTOS,
also known as ("aka") "Sugarbear" ("SANTOS"), and DANNY JOSE
SALAZAR, aka "Lonely" ("SALAZAR"), and others known and unknown
to the Grand Jury, conspired and agreed with each other to

SL: VOCS

smm

1 knowingly and intentionally distribute at least 50 grams of
2 methamphetamine, a schedule II controlled substance, in violation
3 of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(A)(viii).

5 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
6 ACCOMPLISHED

7 The object of the conspiracy was to be accomplished, in
8 substance, as follows:

9 1. Defendant SALAZAR would negotiate the sale of
10 methamphetamine with potential customers.

11 2. Defendant SANTOS would contact his supplier to obtain
12 methamphetamine for defendant SALAZAR.

13 3. Defendant SANTOS would provide the methamphetamine to
14 defendant SALAZAR.

15 4. Defendant SALAZAR would sell the methamphetamine to the
16 customers and collect payment for the methamphetamine.

17 C. OVERT ACTS

18 In furtherance of the conspiracy and to accomplish the
19 object of the conspiracy, defendants SANTOS and SALAZAR, and
20 others known and unknown to the Grand Jury, committed various
21 overt acts on or about the following dates, within the Central
22 District of California, and elsewhere, including, but not limited
23 to, the following:

24 1. On May 20, 2010, defendant SALAZAR met with a
25 confidential government informant ("CI") and told the CI, using
26 coded language, that defendant SALAZAR could obtain
27 methamphetamine from defendant SANTOS to sell to the CI.

28 2. On May 25, 2010, defendant SALAZAR, using coded language

1 in a telephone conversation, told the CI that he would meet with
2 the CI once he had the methamphetamine.

3 3. On June 8, 2010, defendant SALAZAR, using coded language
4 in a telephone conversation, arranged to meet with the CI to sell
5 the CI methamphetamine.

6 4. On June 8, 2010, defendant SALAZAR, using coded language
7 in a telephone conversation, told the CI that defendant SANTOS
8 was purchasing the methamphetamine to sell to the CI.

9 5. On June 8, 2010, defendants SALAZAR and SANTOS went to
10 the "Fantastic Burger" restaurant in Long Beach, California, for
11 the purpose of selling methamphetamine to the CI.

12 6. On June 8, 2010, defendant SANTOS provided approximately
13 110.3 grams of methamphetamine to defendant SALAZAR.

14 7. On June 8, 2010, defendant SALAZAR sold approximately
15 110.3 grams of methamphetamine to the CI in exchange for
16 approximately \$3,600.

17 8. On June 18, 2010, defendant SALAZAR, using coded
18 language in a telephone conversation, asked the CI whether the CI
19 liked the methamphetamine he purchased from defendants SALAZAR
20 and SANTOS, and told the CI that defendant SALAZAR would
21 introduce the CI to defendant SANTOS the next time they met.
22
23
24
25
26
27
28

COUNT TWO

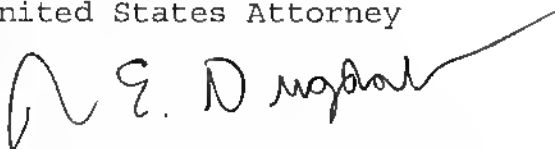
[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

On or about June 8, 2010, in Los Angeles County, within the Central District of California, defendants GERALDO RAYMOND SANTOS, also known as ("aka") "Sugarbear," and DANNY JOSE SALAZAR, aka "Lonely," knowingly and intentionally distributed at least 50 grams, that is, approximately 110.3 grams, of methamphetamine, a schedule II controlled substance.

A TRUE BILL

151
Foreperson

ANDRÉ BIROTTE JR.
United States Attorney


ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division

ELIZABETH R. YANG
Assistant United States Attorney
Chief, Violent & Organized Crime Section

CHRISTOPHER BRUNWIN
Assistant United States Attorney
Deputy Chief, Violent & Organized Crime Section

SARAH LEVITT
Assistant United States Attorney
Violent & Organized Crime Section